

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

IN RE: VEHICLE TRACKING AND SECURITY SYSTEM ('844 PATENT LITIGATION)	MDL NO. 11-2249
PJC LOGISTICS, LLC  Plaintiff,  v.  AAA Cooper Transportation, Inc., <i>et al.</i>  Defendants.	Civil No. 0:11-cv-02550-DWF-SER

**MOTION**

Defendants, UPS, Inc. and The Coca-Cola Company, hereby move the Court for an Order dismissing Plaintiff PJC Logistics, LLC.'s Complaint under Rule 8(a) and Rule 12(b)(6) as set forth in the accompanying memorandum.

Dated: November 4, 2011

By: s/ Dennis C. Bremer  
Dennis C. Bremer (MN # 299,182)  
James R. Hietala, Jr. (MN# 386,755)  
Carlson, Caspers, Vandenburg & Lindquist  
225 South Sixth Street, Suite 3200  
Minneapolis, MN 55402  
(612) 436-9614  
[dbremer@ccvl.com](mailto:dbremer@ccvl.com)  
[jhietala@ccvl.com](mailto:jhietala@ccvl.com)

OF COUNSEL:

Robert L. Lee (GA# 443978)  
Matthew W. Howell (GA# 607080)  
Alston & Bird, LLP  
1201 W. Peachtree Street  
Atlanta, Georgia 30309  
(404) 881-7000  
bob.lee@alston.com  
matthew.howell@alston.com

*Counsel for Defendants UPS, Inc. and  
The Coca-Cola Company*